

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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PROJECT VERITAS and PROJECT	:
VERITAS ACTION FUND,	: Civil Action No. 7:23-cv-04533
	:
Plaintiffs,	:
	:
-against-	:
	:
JAMES O'KEEFE, TRANSPARENCY 1,	:
LLC d/b/a O'KEEFE MEDIA GROUP,	:
ANTHONY IATROPOULOS, and RC	:
MAXWELL,	:
	:
Defendants.	:
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**MEMORANDUM IN SUPPORT OF
MOTION TO WITHDRAW
AS COUNSEL OF RECORD
FOR PLAINTIFFS PROJECT
VERITAS AND PROJECT
VERITAS ACTION FUND AND FOR
STAY**

Pursuant to Local Civil Rule 1.4, Attorney Jay M. Wolman of Randazza Legal Group, PLLC (“Movant”), upon the affidavit filed herewith, seeks leave of court to withdraw from the representation of Plaintiffs, Project Veritas and Project Veritas Action Fund (“Plaintiffs”). Further, in order to reduce the burden on withdrawing counsel and ensure that Plaintiffs are not prejudiced by the withdrawal, Movant requests that the Court stay all proceedings and extend all deadlines by 60 days. In support hereof, Movant states as follows:

1. On May 31, 2023, Movant filed the above-captioned action on behalf of Plaintiffs.
2. Since then, Movant has provided representation of Plaintiffs in this matter.
3. Plaintiffs have failed in their obligations pursuant to their representation agreement with Movant, specifically, as to Sections 3 & 6 thereof, and Section 9 of the said agreement authorizes Movant to withdraw in the event of such failure.
4. The present posture of the case is that discovery is under way. Both sides have served and responded to initial interrogatories and document requests, with document production in progress by both sides. Plaintiffs have served two tranches of document production and could

otherwise complete production by the end of the calendar year. Three depositions have been taken by Defendants; while Defendants intend to depose others, including Project Veritas's president and a corporate representative of each Plaintiff, such is not to occur well into January 2025. Issues regarding confidentiality of a deposition and certain documents and the settlement with Defendant Maxwell are pending, with deadlines set by order of December 13, 2024, but Movant should not bear the burden of compliance.

5. Movant is not asserting a retaining lien. Movant is asserting a charging lien pursuant to N.Y. Jud. Law § 475 on all claims and causes of action brought by Plaintiffs and on any award of fees for the defense of the counterclaims.

6. To avoid prejudice to all parties, a 60 day stay and extension of all deadlines should be granted to ensure that successor counsel can be retained and properly respond to all outstanding matters.

WHEREFORE, Movant respectfully requests that this Court grant Attorney Wolman leave to withdraw his appearance on behalf of Plaintiffs.

Dated: December 19, 2024.

Respectfully Submitted,

/s/ Jay M. Wolman

Jay M. Wolman (JW0600)
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 19, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF.

Copies have also been served upon Defendant R.C. Maxwell via electronic mail: rc@rcmaxwell.com, and upon Plaintiffs as follows:

Project Veritas: To Ben Wetmore, President, via electronic mail: benwetmore@protonmail.com & ben@projectveritas.com and via First class mail, postage prepaid: 4700 Millenia Blvd., Ste. 500, Orlando, FL 32839; and

Project Veritas Action Fund: To Joseph Barton, President, via electronic mail: joseph.j.barton@gmail.com and via First class mail, postage prepaid: 4700 Millenia Blvd., Ste. 500, Orlando, FL 32839

Respectfully Submitted,

/s/ Jay M. Wolman

Jay M. Wolman (JW0600)